

1 ROBERT W. FERGUSON
Attorney General
2 DAVID WARD
DANIEL J. JEON
3 Assistant Attorneys General
Attorney General of Washington
4 Civil Rights Division
800 Fifth Avenue, Suite 2000
5 Seattle, WA 98104
(206) 464-7744
6
7
8

9 **UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

10 UNION GOSPEL MISSION OF
YAKIMA, WASH.,

11 Plaintiff,

12 v.

13 ROBERT FERGUSON, in his
14 official capacity as Attorney
General of Washington State;
15 ANDRETA ARMSTRONG, in
her official capacity as Executive
16 Director of the Washington State
Human Rights Commission; and
17 DEBORAH COOK,
GUADALUPE GAMBOA, JEFF
18 SBAIH, and HAN TRAN, in
their official capacities as
19 Commissioners of the
Washington State Human Rights
20 Commission,

21 Defendants.
22

NO. 1:23-cv-3027-MKD

DECLARATION OF KEELY
TAFOYA IN SUPPORT OF
DEFENDANTS' RESPONSE
TO PLAINTIFF'S MOTION
FOR PRELIMINARY
INJUNCTION

DECLARATION OF KEELY
TAFOYA IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION

ATTORNEY GENERAL OF WASHINGTON
Civil Rights Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, Keely Tafoya, hereby state and declare as follows:

2 1. I am over eighteen years of age, have personal knowledge of and am
3 competent to testify about the matters herein.

4 2. I am the Litigation and Administrative Manager for the Wing Luke
5 Civil Rights Division of the Washington State Attorney General's Office (Civil
6 Rights Division). My role is the lead administrative position in the Civil Rights
7 Division, and includes supervision of all the Division's intake work and
8 constituent correspondence.

9 3. The Civil Rights Division investigates discriminatory policies and
10 practices and enforces state and federal civil rights laws, including the
11 Washington Law Against Discrimination, on behalf of the people of the State of
12 Washington.

13 4. The Civil Rights Division was created in January 2015, as a unit
14 within the Washington State Attorney General's Office (the Civil Rights Unit),
15 before subsequently becoming a full "Division" in February 2019. The Civil
16 Rights Unit first began accepting intake inquiries and complaints from members
17 of the public in September 2015, and has continued to do so since that time.

18 5. Since September 2015, it has been the Civil Rights Division's
19 practice to log its intake inquiries and complaints contemporaneously upon
20 receipt. The Civil Rights Division's intake logs are maintained electronically in
21 searchable formats. As Litigation and Administrative Manager, I oversee and
22

1 maintain the Civil Rights Division's intake logs and am very familiar with
2 conducting searches within the logs, which I perform regularly.

3 6. I conducted a search of the Civil Rights Division's intake logs to
4 check whether the Civil Rights Division has ever received any complaint or
5 inquiry about the Union Gospel Mission of Yakima (UGM) prior to UGM filing
6 the present lawsuit.

7 7. The Civil Rights Division never received any intake complaint or
8 inquiry about UGM prior to UGM filing this lawsuit.

9 8. After UGM filed this lawsuit and it was publicized by UGM and the
10 media, the Attorney General's Office received an email from a constituent
11 alleging that her mother (who is now deceased) was terminated from UGM eight
12 years ago because of extramarital sexual activity. A true and correct copy of this
13 email is attached hereto as Exhibit A. The Civil Rights Division has not opened
14 any investigation related to this allegation.

15 9. The Civil Rights Division has no present or ongoing investigation
16 into UGM, and has never investigated UGM in the past.

17 I declare under penalty of perjury under the laws of the State of
18 Washington that the foregoing is true and correct.

19 DATED this 26th day of April, 2023, at Tacoma, Washington

20
21 
22 Keely Tafoya

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

DATED this 26th day of April, 2023.



TIFFANY JENNINGS
Legal Assistant

TAFOYA DECLARATION

EXHIBIT A

From: [ATG WWW Email AGO temporary](#)
To: [ATG MI Civil Rights](#)
Subject: FW: Lawsuit against UGM
Date: Tuesday, April 11, 2023 3:04:48 PM

Thank you.

Britt Youngblood

Constituent Correspondence Liaison
Washington State Attorney General's Office
britt.youngblood@atg.wa.gov | 360.586.0725

From: Holli Deleon <holli.d509@gmail.com>
Sent: Tuesday, April 11, 2023 1:46 PM
To: ATG MI Service Documents <ServiceATG@atg.wa.gov>
Subject: Lawsuit against UGM

[EXTERNAL]

Hi I'm not even sure even if I'm even reaching out to the right person but this is in regards to the lawsuit against the Union Gosple Mission and the hiring and firing of people solely on the person's faith. My mom also worked for UGM yakima for about 8 years give or take and was fired because a coworker told her supervisor that my mom recently got involved with a man who lived in her apt complex and was having sex out of wedlock! My mom was so upset and told me she did not need she needed to defend herself about this, she had worked there long enough they should know her well enough that they would not just take this recent lady hired, about her and her sex life. Unfortunately they fired her over this! She was 55 years old and this was the beginning of her downfall! She past away 2 years later. If there is anything I can do to help you with this please email me back. Thank you, hollie deleon